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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

In re:

) Case No.: 23-50023 MEH
) Chapter 13

Y. ROGER YU,

Debtor.

) **DECLARATION OF ARASTO FARSAD
) IN SUPPORT OF EX PARTE MOTION
) TO FILE DOCUMENTS UNDER SEAL
) (CONFIDENTIAL SETTLEMENT
) AGREEMENT)**

) Judge: M. Elaine Hammond

I, Arasto Farsad, am the Managing Member of FARSAD LAW OFFICE, P.C., the attorney of record in the instant case. I make this declaration on the basis of personal knowledge, and if called to testify as a witness, I would and could testify competently hereto. I declare as follows:

1. After a significant number of negotiations, the Debtor (my client) and his Secured Creditor were finally able to reach a settlement as to all claims. In order to get both sides to agree, the settlement agreement ("Agreement") needed to be confidential.

2. In that regard, the Agreement contains a confidentiality clause and so in order to abide by the terms of the clause, I now seek a Court Order allowing us to seal and keep the actual agreement 'confidential'. We would like the Court to have access to it, and will also provide secured claimants access if requested, but no other parties.

1 3. The Agreement as stated above is intended to be confidential. It also has personal
2 and sensitive information that neither side would like disclosed to the general public on the
3 Court's general open case docket.

4 4. Filing this Agreement using the regular ECF process would jeopardize the
5 agreement between the parties.

6 5. Therefore, I ask the Court to recognize it would be in the Debtor's-as well as the
7 Secured Creditor's best interests-for this Agreement to be filed under seal.

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9 I declare under penalty of perjury that the foregoing is true and correct and that this
10 Declaration was executed in San Jose, California.

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12 Respectfully submitted,

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14 Dated: April 18, 2023

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16 /s/ Arasto Farsad
17 Arasto Farsad, Esq.
18 Attorneys for Debtor
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